

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CARMEN JOHN PERRI,

Plaintiff,

v.

MAYFLOWER PARK HOTEL, INC.,

Defendant.

No. 2:19-cv-00132-JLR

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANT TO RESPOND TO
COMPLAINT IN RE: PERRI v. 621
APARTMENTS, LLC**

(RELATING TO No: 2:19-cv-00139-JLR)

**NOTE ON MOTION CALENDAR:
JULY 22, 2019**

CARMEN JOHN PERRI,

Plaintiff,

v.

425 QUEEN ANNE, LLC,

Defendant.

No. 2:19-cv-00137-JLR

STIPULATION AND [PROPOSED] ORDER TO EXTEND
DEADLINE FOR DEFENDANT TO RESPOND TO COMPLAINT

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1 CARMEN JOHN PERRI,

2 Plaintiff,

3 v.

4 621 APARTMENTS, LLC,

5 Defendant.

No: 2:19-cv-00139-JLR

6 CARMEN JOHN PERRI,

7 Plaintiff,

8 v.

9 SORRENTO HOTEL PARTNERSHIP,

10 Defendant.

No: 2:19-cv-00144-JLR

11 CARMEN JOHN PERRI,

12 Plaintiff,

13 v.

14 2301 THIRD AVENUE, LP,

15 Defendant.

No: 2:19-cv-00297-JLR

16 Plaintiff Carmen John Perri ("Plaintiff") and defendant 621 Apartments, LLC
17 ("Defendant"), by and through their undersigned counsel, hereby stipulate to an extension of
18 the time for Defendant to answer or otherwise respond to the Complaint [Dkt. No. 1, Case No.
19 C19-0139JLR] to August 21, 2019, to further facilitate the prospect of settlement discussions.

20 The Parties hereby submit that good cause exists for extension of the time for Defendant
21 to answer or otherwise respond to the Complaint, as follows.

- 22 1. Plaintiff filed the Complaint on January 30, 2019.
23 2. Defendant received the Summons and Complaint in early February, 2019.
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25

3. Defendant's counsel was first retained in this matter on April 18, 2019, and filed a Notice of Appearance on April 19, 2019.

4. The parties have made progress in settlement discussions, remain actively engaged in negotiations, and request that the deadline for Defendant to respond to the Complaint be extended to August 21, 2019, to facilitate such discussions by allowing more time for Defendant to prepare a response to the Complaint.

DATED this 22nd day of July, 2019.

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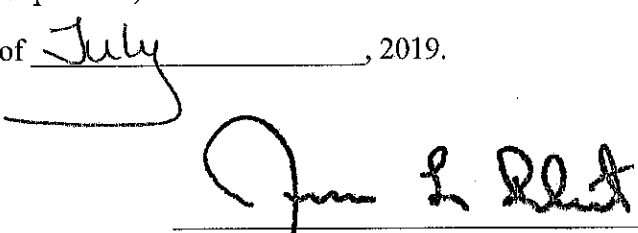
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Attorney for Plaintiff Carmen John Perri

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED.

DATED this 25th day of July, 2019.


HONORABLE JAMES L. ROBART
United States District Judge

Presented by:

CORR CRONIN LLP

s/ Todd T. Williams

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